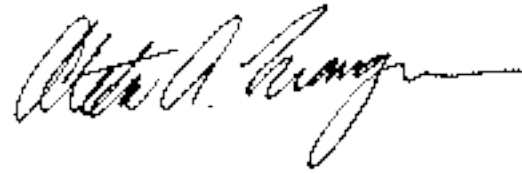


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION



JULIE ANNE STAMPS,)	
)	
Plaintiff,)	Case No. 3:21-cv-00746
)	
v.)	District Judge Trauger
)	
THE LAMPO GROUP, LLC,)	Jury Demand
)	
Defendant.)	

DEFENDANT'S MOTION TO EXTEND DISCOVERY RESPONSE DEADLINES

Defendant, The Lampo Group, LLC, by and through the undersigned counsel, moves the Court to extend its deadlines to respond to Plaintiff's First Set of Interrogatories and First Requests for Production of Documents from January 24, 2022 to February 28, 2022. In support of this motion, Defendant states the following:

1. This is an employment case.
2. Plaintiff's employment with Defendant ended in July 2020.
3. On August 25, 2021, Plaintiff filed a bankruptcy petition under Chapter 13 of the United States Bankruptcy Code, *In re: Julie Anne Stamps*, Case No. 3:21-bk-02597, in the U.S. Bankruptcy Court for the Middle District of Tennessee. A copy of Plaintiff's bankruptcy petition is attached as Exhibit 1.
4. On September 29, 2021, Plaintiff filed a complaint against Defendant (Doc. #1).
5. On September 30, 2021, Plaintiff amended her bankruptcy schedules to add this lawsuit as an asset. Copies of Plaintiff's amended bankruptcy schedules are attached as Exhibit 2.
6. On October 13, 2021, Plaintiff moved the bankruptcy court for authorization to